FILED IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

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NASHVILLE DIVISIÓN

RUTH SMITH, Individually and ad Widow for the Use and Benefit of herself and the Next of Kin of RICHARD SMITH, Deceased,

Plaintiff,

No. 3:05-cv-00444

VS.

Judge Aleta A. Trauger

PFIZER INC., PARKE-DAVIS a division of Warner-Lambert Company and Warner-Lambert Company LLC, WARNER-LAMBERT COMPANY, WARNER-LAMBERT COMPANY LLC and JOHN DOE(S) 1-10,

Defendants.

MOTION FOR ADMISSION PRO HAC VICE OF ROBERT E. LEONE, ESO.

Robert E. Leone, Esq. respectfully moves this Court for leave to be admitted pro hac vice in this case on behalf of Plaintiff Ruth Smith. In support of this motion, the applicant states as follows:

- I practice law at the Lanier Law Firm, P.C., 6810 FM 1960 West, Houston, Texas 77069. I am a member of the Texas Bar, and have been admitted to practice in the following courts: United States Supreme Court and all Texas state courts. I have attached the enclosed a Certificate of Good Standing from the Texas Supreme Court dated 11/30/09.
- 2. I have been associated by Charles F. Barrett, Barrett & Associates, P.A., 6518 Highway 100, Suite 210, Nashville, Tennessee 37205, who currently represents

Plaintiff in this case and who currently resides in, and is admitted to practice, in the State of Tennessee.

- 3. I acknowledge that, in practicing before this Court, I will be subject to all disciplinary rules and procedures applicable to members of the Tennessee Bar. I have never been disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States, nor have I ever received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the bar.
- 4. I certify that I have read and am familiar with the Uniform Local Rules of the United States District Court for the Middle District of Tennessee.

WHEREFORE, I respectfully request that the Court grant this motion to participate as an attorney in this case *pro hac vice* for Plaintiff.

Dated: December 1, 2009.

Respectfully submitted,

Ken S Soh (TSB#00794670)

THE LANIE LAW FIRM.

W. Mark Lanier (TSB#11934600)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served via the Court's ecf filing system on this 11 day of December, 2009 on the following:

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